

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and  
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**FORD'S UNOPPOSED MOTION TO  
REVISE CASE SCHEDULE**

NOTE ON MOTION CALENDAR:  
January 30, 2014

Ford hereby requests a slight modification to the case schedule in order to allow the parties sufficient time to respond to opening expert reports and to depose the multiple experts disclosed in this case. Plaintiffs do not oppose this request so long as no other deadlines are affected. The requested modifications continue the deadlines for rebuttal expert reports and the close of discovery by just one week each. Under the proposed schedule, the dates for motions in limine, pretrial procedures, and trial remain intact. The parties have agreed that they will not use the requested modifications to the rebuttal expert report deadline and the close of discovery as a basis for requesting to move the trial date, or any other date after the close of discovery. Ford respectfully submits that there is good cause to move these two deadlines, as the previous schedules proposed by the parties and adopted by the Court allowed for approximately one month between the deadlines for service of opening expert reports and rebuttal reports. Dkt.

Nos. 39, 183, 206. This timeline will allow the parties to fully respond to the issues raised in opening expert reports. Ford therefore respectfully moves the Court to enter a schedule reflecting the revised deadlines set out in Exhibit 1.

DATED: January 30, 2014

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Attorneys for Defendant Ford Motor Company

**IT IS SO ORDERED.**

Dated this \_\_\_\_\_ day of January 2014

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THE HONORABLE BENJAMIN H. SETTLE  
United States District Judge

**CERTIFICATE OF SERVICE**

I certify that this pleading was filed electronically with the Court and thus served simultaneously upon all counsel of record, this 30<sup>th</sup> day of January, 2014.

/s/ Duncan E. Manville

Duncan E. Manville

**Exhibit 1**

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>Revised Deadline</u></b>
Opening expert reports	2/10/14	2/10/14
Rebuttal expert reports	2/28/14	3/7/14
All motions related to fact discovery must be filed	2/14/14	2/14/14
Expert depositions	2/26/14 – 3/12/14	3/7/14 – 3/21/14
Close of fact and expert discovery	3/14/14	3/21/14
Dispositive Motion (and <i>Daubert</i> Motion) Deadline	3/27/14 (motions noted for 4/18/14)	3/27/14 (motions noted for 4/18/14)
Motions in limine	5/12/14 (motions noted for 5/23/14)	5/12/14 (motions noted for 5/23/14)
Agreed pretrial order, trial briefs, proposed voir dire, and jury instructions due	5/27/14	5/27/14
Pretrial conference	6/2/14	6/2/14
Trial Begins	6/16/14	6/16/14